



Environmental Protection Agency

1701 First Avenue, Maywood, IL. 60153

312/345-9780

Refer to: 0311740003 - Cook County - Summit/I.W.I. Industries

May 10, 1985

John L. Parker and Associates, Ltd.
39 South LaSalle Street
Chicago, Illinois 60603

Attn: Mr. John L. Parker

Dear Mr. Parker:

This will confirm our telephone conversations of May 6th and 7th, 1985, and the receipt of your May 6, 1985 letter regarding an on-site inspection at the subject facility.

While your letter confirms an inspection date of May 14, 1985, we actually agreed upon the date of May 15, 1985, during our telephone conversations. Mr. Clifford Gould will inspect the subject site on May 15, 1985 at 9:30 A.M.

Sincerely,

Kenneth P. Bechely, Northern Region Manager
Field Operations Section
Division of Land Pollution Control

KPB:gec

cc: Division File
Northern Region
Glenn Wellman - I.W.I. Ind.

RECEIVED

MAY 14 1985

IEPA-DLPC

LAW OFFICES
JOHN L. PARKER & ASSOCIATES, LTD.
39 SOUTH LA SALLE STREET
CHICAGO, ILLINOIS 60603

(312) 263-6560

May 8, 1985

RECEIVED

MAY 08 1985

ILL. E.P.A. - D.L.P.C.
STATE OF ILLINOIS

Mr. Kenneth P. Bechely
Northern Region Manager
Field Operations Section
Division of Land Pollution Control
Illinois Environmental Protection Agency
1701 First Avenue
Maywood, IL 60153

RECEIVED

MAY 14 1985

IEPA-DLPC

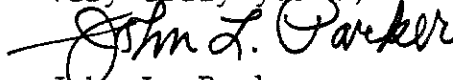
Re: Your Reference
0311740003 - Cook County -
Summit/IWI Industries, Inc.

Dear Mr. Bechely:

Confirming our telecon yesterday, we have agreed that the inspection will be conducted on Wednesday, May 15th rather than on May 14th. I will meet your inspectors at the facility at 9:30 A.M. on May 15, 1985.

Also, I requested that you forward us copies of all of the analytical data which you obtained on samples taken from this facility. While some of this data was forwarded to Mr. Wellman along with your letter dated May 1, 1985, we would like to receive all of the data which you have on any sample taken from this facility. We requested that this data be provided to us at the time of your inspection last August, and I understood from Mr. Finley, Ms. Wang and your other representatives present that this data would be provided to us. We look forward to receipt of this data at your earliest convenience.

Very truly yours,


John L. Parker

JLP:dsc

cc: Mr. Clifford Gould
Field Operations Section
Division of Land Pollution Control
Illinois Environmental Protection Agency
1701 First Avenue
Maywood, IL 60153

Donald L. Gimbel, Esq.
Technical Advisor
Enforcement Programs
(Same address as Mr. Gould)

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MAY 09 1985

IEPA-DLPC

RECEIVED

MAY 07 1985

ILL. E.P.A. - D.L.P.C.
STATE OF ILLINOIS

LAW OFFICES

JOHN L. PARKER & ASSOCIATES, LTD.

39 SOUTH LA SALLE STREET
CHICAGO, ILLINOIS 60603

(312) 263-6560

May 6, 1985

MAILED CERTIFIED
MAIL - RETURN RE-
CEIPT REQUESTED

Mr. Kenneth P. Bechely
Northern Region Manager
Field Operations Section
Division of Land Pollution Control
Illinois Environmental Protection Agency
1701 First Avenue
Maywood, IL 60153

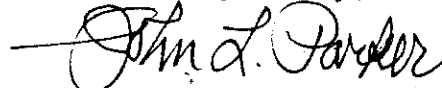
Re: Your Reference
0311740003 - Cook County -
Summit/IWI Industries, Inc.

Dear Mr. Bechely:

We have been informed by Mr. Wellman of IWI Industries that he has received a letter from you dated May 1, 1985, which is in response to my letter to you dated April 25, 1985. Please address all future correspondence concerning this matter to this office.

We cannot accomodate you for another inspection on the date stated in your letter, May 8, 1985. We can, however, so accomodate you on May 14, 1985 at 9:30 A.M. Please confirm this May 14th date and time in writing.

Yours very truly,



John L. Parker

JLP:dsc

cc: Mr. Clifford Gould
Field Operations Section
Division of Land Pollution Control
Ill. Environmental Protection Agency
1701 First Avenue Avenue
Maywood, IL 60153

Donald L. Gimbel, Esq.
Technical Advisor
Enforcement Programs
(Same address as Mr. Gould)



312/345-9780

Refer to: 0311740003 - Cook County - Summit/IWI Industries, Inc.

April 8, 1985

IWI Industries, Inc.
7738 W. 61st Place
Summit, Illinois 60501

Dear Mr. Wellman:

On August 2, 1984, representatives of this Agency visited your facility in order to 1) investigate a complaint, and 2) sample material in order to determine what it might be.

Several samples were collected at that time and were submitted to the Agency laboratories for analysis. Three of these samples indicate that the concentration of lead and chromium exceed the EP Toxicity levels established in 35 Ill. Adm. Code 721.124.

Because the sample results indicate that the materials being stored at your facility exhibit the characteristic of EP Toxicity you are regulated as a generator and TSD of hazardous waste. Based on this, the Agency requests that you contact Cliff Gould, at the above number, within five (5) days of the date of receipt of this letter in order to arrange for an appointment to conduct an inspection of your facility to determine your compliance with the requirements of 35 Ill. Adm. Code, Subtitle G, Waste Disposal.

Should you have any questions regarding this matter, contact me at the above number.

Sincerely,

Kenneth P. Bechely, Northern Region Manager
Field Operations Section
Division of Land Pollution Control

KPB:CG:pgb:1895A

Enclosure: Sample Results

cc: ~~Division File~~
Northern Region
P. Jagiello
D. Gimbel

RECEIVED

APR 11 1985

IEPA-DLPC

LAW OFFICES
JOHN L. PARKER & ASSOCIATES, LTD.
39 SOUTH LA SALLE STREET
CHICAGO, ILLINOIS 60603

(312) 263-6560

August 3, 1984

RECEIVED

AUG 06 1984

ILL. E.P.A. - D.L.P.C.
STATE OF ILLINOIS

Mr. Richard Finley
Environmental Protection Specialist
Field Operations Section
Division of Land Pollution Control
Illinois Environmental Protection Agency
1701 First Avenue
Maywood, IL 60153

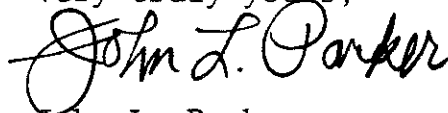
Re: I.W.I. Plant
Summit, Illinois

Dear Mr. Finley:

In accordance with our discussion yesterday during your acquisition of samples from the subject Plant, please forward us a copy of the sample analyses as soon as they become available.

Also, since I will be involved in any future Illinois EPA visit to the subject Plant, please contact me to arrange any such visit.

Very truly yours,



John L. Parker

JLP:dsc

cc: Donald L. Gimbel, Esq.
Technical Advisor
Enforcement Programs
Illinois Environmental Protection Agency
1701 First Avenue
Maywood, IL 60153

CERTIFIED MAIL - No. 0408883

RECEIVED

AUG 15 1984

IEPA-DLPC

LAW OFFICES
JOHN L. PARKER & ASSOCIATES, LTD.
39 SOUTH LA SALLE STREET
CHICAGO, ILLINOIS 60603

(312) 263-6560

August 3, 1984

Donald L. Gimbel, Esq.
Technical Advisor
Enforcement Programs
Illinois Environmental Protection Agency
1701 First Avenue
Maywood, IL 60153

Re: I.W.I. Plant
Summit, Illinois

Dear Mr. Gimbel:

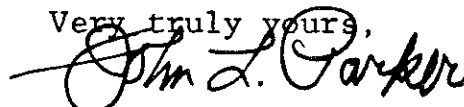
We represent the subject Plant.

During a visit to the Plant yesterday by Mr. Richard Finley of Illinois EPA and a team of inspectors, I was given your name as the Illinois EPA attorney involved.

I requested that Mr. Finley return to us the photographs (negatives and positives) that he took during his surreptitious entry through the back door of the Plant on July 2, 1984. Photographs of the premises are prohibited without express permission of the Company.

Please advise us when these photographs will be returned to us.

Very truly yours,


John L. Parker

JLP:dsc

cc: Mr. Richard Finley ✓
Environmental Protection Specialist
Field Operations Section
Division of Land Pollution Control
Illinois Environmental Protection Agency
1701 First Avenue
Maywood, IL 60153

CERTIFIED MAIL - No. 0408884

RECEIVED
AUG 15 1984
IEPA-DLPC



Environmental Protection Agency

2200 Churchill Road, Springfield, Illinois 62706

217/782-5544

*File
Crown Co. - General*

July 28, 1981

Mr. Glenn Wellman, President
I.W.I. Industries
7738 West 61st Place
Summit (Argo), Illinois 60501

Re: I.W.I. Industries (Formerly Wellco Chemical Co.)

Dear Mr. Wellman:

Personnel of the Agency have determined that I.W.I. Industries' facility contains numerous barrels of unidentified waste materials as well as at least two 12,000 gallon tanks containing unknown quantities of similarly unidentified material. The Agency is required by federal and state laws to inspect and identify actual or potential contaminant sources, disposal sites and storage areas. In order to fulfill its legal responsibility, the Agency proposes to inspect your facility in the near future in order to determine the nature, quantity and method of handling of waste materials by I.W.I. Industries. Such an inspection may include the collection of samples for laboratory analysis.

It is not the Agency's intention to unnecessarily interfere with the proper operation of the facility; therefore, please advise the undersigned as to what inspection date and time would be most convenient to you while assuring Agency access to all waste hauling or storage facilities so that all waste materials may be inspected or sampled. If no response is received from you within 10 days, the Agency will exercise its authority, pursuant to Section 4(d) of the Illinois Environmental Protection Act, to enter and inspect the premises at a reasonable time of its choosing.

If you have any questions or comments, please don't hesitate to contact the undersigned at the indicated address or telephone number.

Sincerely,

Phillip R. VanNess
Attorney
Enforcement Programs

PRV:jab/1632C/1

c.c. [unclear]
[unclear]

RECEIVED

JUL 29 1981

E.P.A. — D.L.P.C.
STATE OF ILLINOIS



ILLINOIS ENVIRONMENTAL PROTECTION AGENCY

MEMORANDUM

DATE: April 14, 1981

TO: ~~Division File~~

FROM: Charles Gebien

SUBJECT: Cook County - Summit/I.W.I. Industries (Welco) (C-81-196) - *General*

On April 9, 1981, Jim Corcoran, MSD-PCD, Tom Conroy, MSD-PCO, Everette Mortenson, USEPA - S&A Division, and I revisited the subject site. Arrangements for our visit were made by Mary Drake, IEPA-LPC Attorney, with Mr. Glenn Wellman, President - I.W.I. Industries on Monday, April 6, 1981. After Mr. Wellman refused to allow our entry into the plant earlier that day because of what Mr. Wellman explained to be "a plant breakdown".

Upon our arrival at the plant we met with Mr. Wellman and Mr. Cerda, I.W.I. Plant Engineer. Mr. Mortenson informed Mr. Wellman that the intent of our visit was to obtain a sample of I.W.I.'s tank cleaning sludge waste and determine through analysis if this waste is hazardous according to the federal part 261 definition of hazardous wastes. Mr. Wellman agreed to allow us to sample this waste but suggested that a sample could not be safely withdrawn from the storage tank. He also suggested that this waste is not hazardous and consists of a non-caustic mixture of detergent, paints, industrial coatings, grease, cutting oils, motor oils, and hydraulic oils.

After proceeding to the waste storage tank area, we found that the storage tanks could not be safely sampled. Access to the inside of the tanks is limited, as far as we could determine, to the inflow pipe and a bolted on "man hole" sized circular plate. Removal of the plate could have resulted in a spill as the level of waste within the tank is unknown. Mr. Wellman suggested that we return to the plant on a weekend and obtain a sample from the inflow system while the system was shut down.

Mr. Mortenson suggested that such arrangements could be made after consulting with the USEPA Enforcement Division. I will stay in contact with Mr. Mortenson and attempt to escort him to sample when arrangements are made.

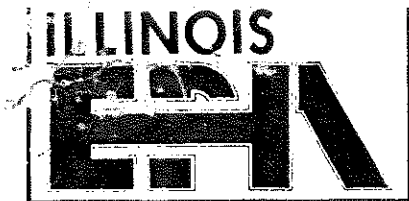
cc: Northern Region

CG/sss

RECEIVED

APR 20 1981

E.P.A. - D.L.P.C.
STATE OF ILLINOIS



Environmental Protection Agency

2200 Churchill Road, Springfield, Illinois 62706

M E M O R A N D U M

TO: Phil Van Ness

FROM: Mark Haney

DATE: July 14, 1981

SUBJECT: SUMMIT/IWI INDUSTRIES (Formerly Wellco Chemical Company) 03117403

5/20/81

I first visited IWI on May 20, 1981 accompanied by Dennis Masstroddi. We inadvertently walked in the rear entrance located on West 62nd Place after unsuccessfully searching for the main entrance on West 61st Place. At that time I noted between 20 and 30 barrels located on a dock west of the northernmost building. Also it appeared that some type of sludge had been dumped off the dock onto what appeared to have once been a railroad siding (the tracks are no longer in place). Before I could take any pictures an individual from IWI approached us and asked us to go to the plant main entrance on West 61st Place. We did so and waited in the reception area approximately 30-45 minutes until Mr. Glenn Wellman, company president, returned from an errand. He then returned but would not see us, we were told, without an appointment, and since the pay phone in the reception area was out of order, we had to leave without an agreed upon inspection date.

6/23/81

I returned to IWI on June 6, 1981 in order to get pictures of possible violations. Because we still hadn't been successful in obtaining an appointment, I walked down the railroad siding to the west of IWI in order to remain off-site. Five pictures were taken from the railroad siding and one from north of the facility. I then proceeded to the reception area in an attempt to at least set up an appointment to get on-site. In the office I was told Mr. Wellman was on vacation for two weeks and would not return until June 29th. In his absence I met with Mr. Jose Cerda and we set up a tentative appointment for 12:00 Noon on July 8, 1981. Between June 29th and July 6th I called to confirm our appointment. However, Mr. Wellman would not return my call.

7/8/81

Because our appointment had never been confirmed and I suspected I again might be unsuccessful in getting onto the site, I arrived early at IWI in an attempt to talk to Mr. Wellman. He agreed to let me on-site but first we talked about his company's waste streams and applicability of RCRA regulations. He said his company manufactures tank spray nozzles, tank and drum washers and bulk liquid shipping tanks. Wellman contends that no wastes other than scrap metal are generated in manufacturing. However, IWI also does repair work on damaged bulk liquid shipping tanks they previously sold new. Because these tanks are used by chemical and paint industries I asked him if they are completely empty and clean when they are returned for repair. Wellman said they were empty and clean except "very rarely" a small amount of residue might be let in the bottom. He then claimed that this residue and wash water from rinsing the tanks before repair were contained on-site and stored in two 12,000 gallon underground tanks. He said he would store the material until the tanks were full, then get the required permits and dispose of it. We

Page 2
Phil VanNess
July 14, 1981

then walked out into the plant. I noticed that part of one building was burned and although I could not go in it I thought I could see several barrels stored within. We then proceeded, upon my request, to the dock where the barrels previously noted were stored. When asked what was in them Wellman responded that they contained assorted junk, demo materials, and "spilled" material from the north building. He claimed that a warehousing operation called Lake Enterprises had leased the building from IWI previously but was now bankrupt and out of business. He said the operator was a Chuck Utires. He also said the operation had been very lax and that IWI was now trying to clean up the area. I then took two samples, one which appeared to be a paint sludge, and the other which appeared to be a lubricating grease. The first sample was from a barrel, the second from the ground adjacent to the dock. While sampling Mr. Wellman told me that the barrels would soon be gone. In fact, he was sure they would be gone before I got the results from my samples. When I asked him who would haul the materials away he said the Village of Summit took all their wastes. Wellman also said 2 people from EPA had been at the plant last month and had found everything to be in order. He could not tell me their names or even which EPA they were from. I took two pictures of the barrels and left the facility.

From IWI I went to the Village of Summit municipal services center and talked to John Santoro, superintendent of public works, and Ed Koenig, building official. They told me that Wellman was a bad actor and that they had had trouble with him before. They said that the village had previously accepted waste from IWI and had taken it to the Summit/American Grading Landfill. However, while unloading one roll-off box employees at the landfill saw that barrels had been placed in the bottom of the unit and then covered with demo materials. From that point on the village has not accepted any waste from IWI according to Santoro. Both Santoro and Koenig were very cooperative with me and agreed to keep an eye on IWI and call me if the barrels were moved. I then spoke with Summit Police Sargent Steve Yurinich who also agreed to watch IWI for any suspicious activity.

MAH:bb

cc: Northern Region
Bill Seltzer
Bill Child
Mike Nechvatal
Division File —

STATE OF ILLINOIS
ENVIRONMENTAL PROTECTION AGENCY
DIVISION OF LAND POLLUTION CONTROL

TELEPHONE CONVERSATION RECORD

COOK COUNTY - LPC

SUMMIT / IWI INDUSTRIES SITE INVENTORY NO. 03117403

Re: SAMPLING ON-SITE WASTE PRODUCTS

Conversation With: CLENN WELLMAN

☒ I Called Party () Party Called Me

DATE: 7/13/81 TIME: ~1:45P

What I Said:

- 1.) I'D LIKE TO MAKE AN APP'T. TO TAKE MORE SAMPLES FROM THE BARRELS ON YOUR BACK DOCK LATE THIS WEEK OR EARLY NEXT.
- 3.) WHERE ARE THE BARRELS GOING?
- 5.) WHO IS PICKING THEM UP?
- 7.) YOU HAVE THE REQUIRED PERMITS?
- 10.) I TURNED THE SAMPLES INTO THE LAB. THEY HAVEN'T BEEN ANALYZED YET.
- 12.) I WAS PLANNING TO COME UP LATER THIS WEEK OR EARLY NEXT.
- 14.) I WON'T BE WALKING IN AND OUT OF YOUR PLANT. I PLAN TO TAKE A FEW SAMPLES FROM THE BARRELS ON YOUR BACK DOCK AND LEAVE.
- 16.) I'LL CALL 10 OR 11 O'CLOCK MONDAY MORNING.

What Other Party Said:

- 2.) THOSE BARRELS WILL BE GONE BY THEN. IN FACT, THEY ARE LOADING THEM NOW, OR WILL DO SO TOMORROW.
- 4.) I DON'T KNOW.
- 6.) THE VILLAGE OF SUMMIT IS TAKING THEM.
- 8.) WE DON'T HAVE PERMITS, BUT THE VILLAGE DOES.
- 9.) HOW DID THOSE SAMPLES YOU TOOK THE OTHER DAY TURN OUT?
- 11.) WHEN ARE YOU PLANNING TO BE IN THIS AREA AGAIN?
- 13.) YOU KNOW ITS VERY DISRUPTIVE TO US TO HAVE YOU PEOPLE WALKING IN AND OUT OF HERE ALL THE TIME.
- 15.) WELL, CALL ME MONDAY MORNING AND WE'LL SEE.

MARK HANEY

TITLE: EPS I

Date: 6/23/81

Time: 9:30-10:05 (A.M.) P.M.

Photograph By:

MARK HANEY

Location: 03117403

COOK Co.

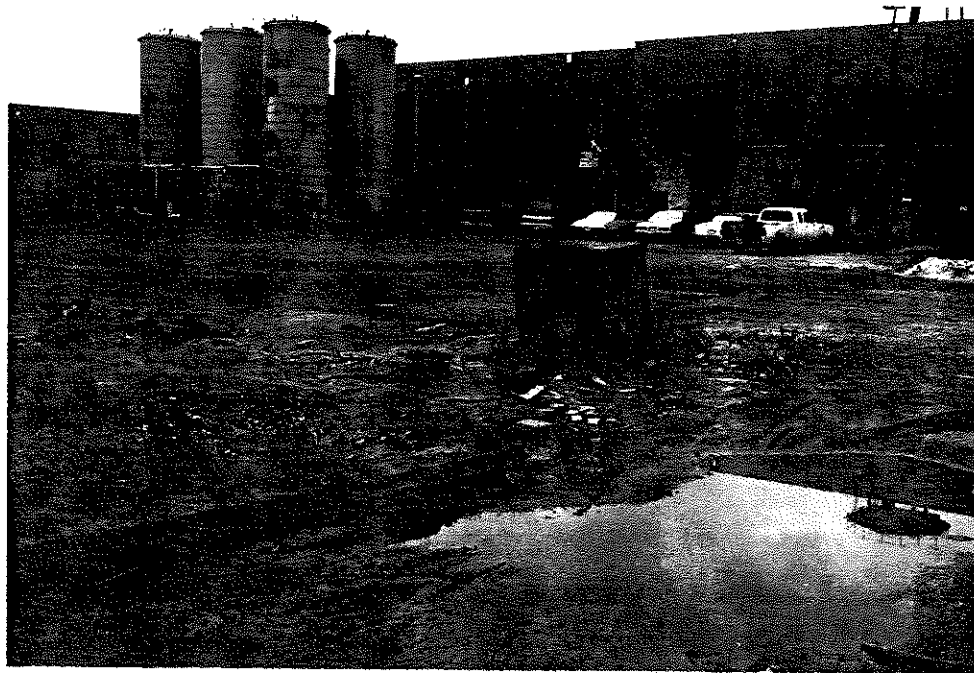
SUMMIT I WELLCO CHEM

Comments: Photograph taken

toward the SOUTHEAST FROM

RR TRACKS WEST OF THE

FACILITY



Date: 6/23/81

Time: 9:30-10:05 (A.M.) P.M.

Photograph By:

MARK HANEY

Location: 03117403

COOK Co.

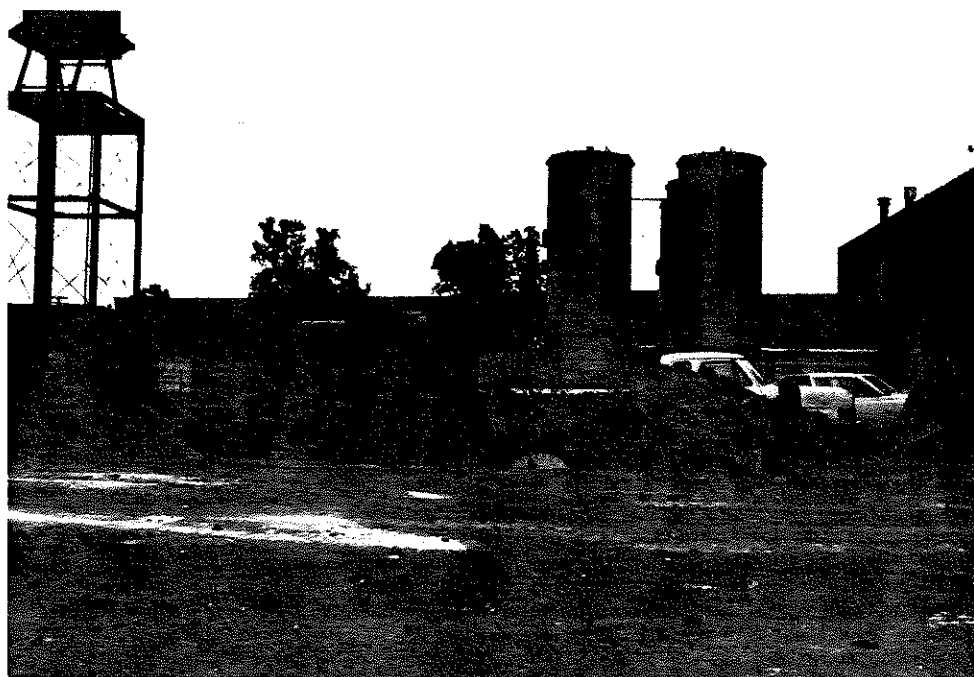
SUMMIT I WELLCO CHEM

Comments: Photograph taken

toward the EAST FROM RR

TRACKS WEST OF THE FAC-

ILITY



Date:

6/23/81

Time:

9:30-10:05

A.M.

P.M.

Photograph By:

MARK HANEY

Location:

03117403

COOK

Co.

SUMMIT

WELCO CHEM

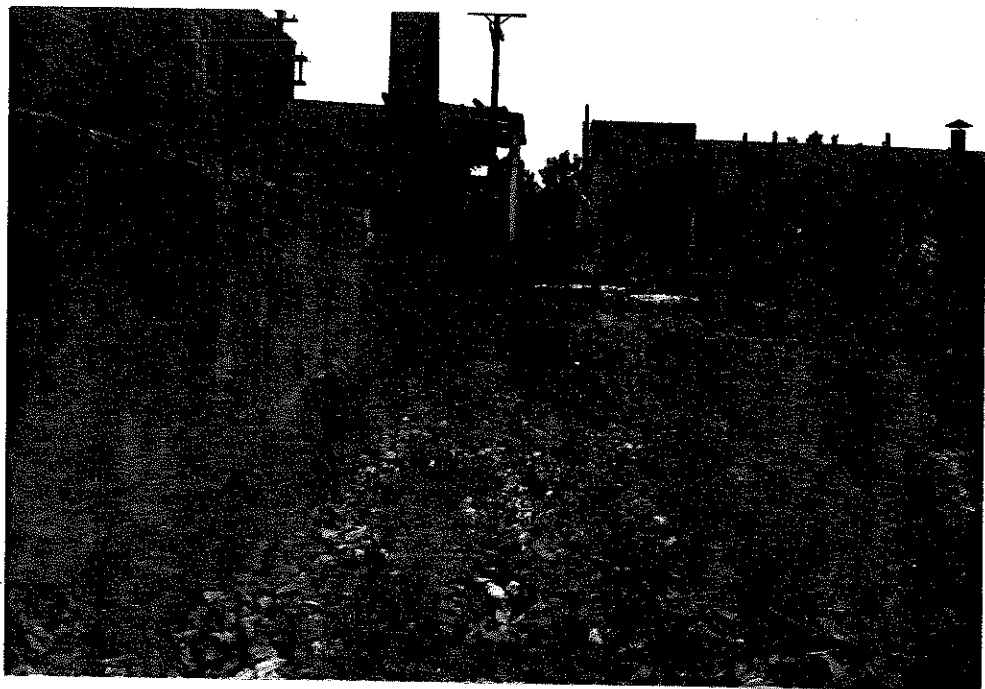
Comments:

Photograph taken

toward the

SOUTH FROM RR

TRACKS WEST OF THE FACILITY



Date:

6/23/81

Time:

9:30-10:05

A.M.

P.M.

Photograph By:

MARK HANEY

Location:

03117403

COOK

Co.

SUMMIT

WELCO CHEM

Comments:

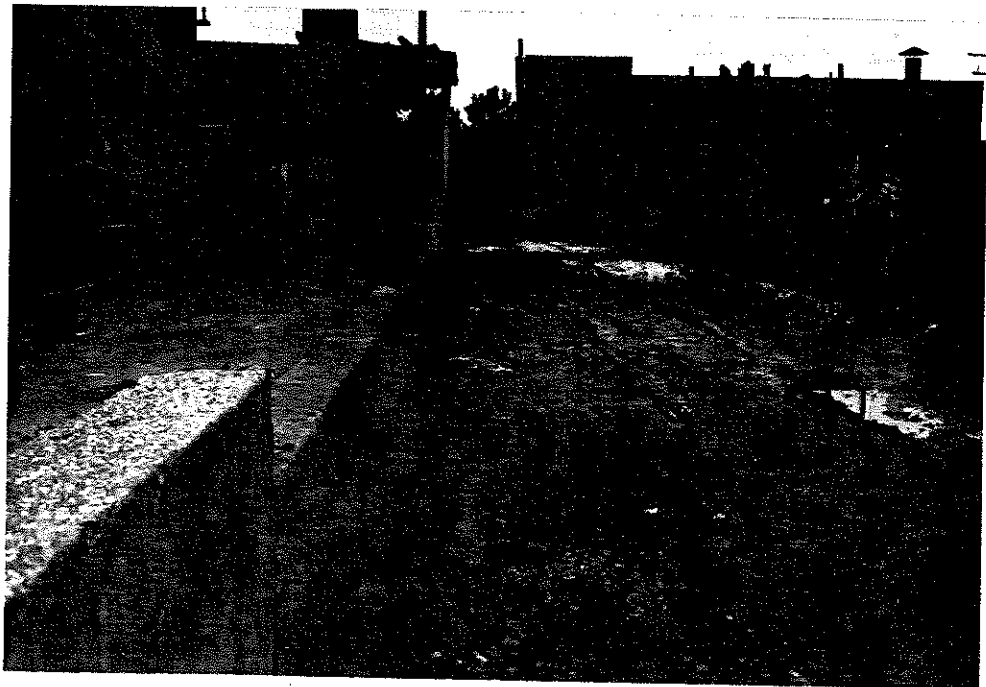
Photograph taken

toward the

SOUTH FROM RR

TRACKS WEST OF THE FAC-

ILITY



Date: 6/23/81

Time: 9:30-10:05 (A.M.) P.M.

Photograph By:

MARK HANEY

Location: 03117403

COOK Co.

SUMMIT WELCO CHEM

Comments: Photograph taken

toward the SOUTHEAST FROM

WESTERN BOUNDARY OF FAC-

ILITY



Date: 6/23/81

Time: 9:30-10:05 (A.M.) P.M.

Photograph By:

MARK HANEY

Location: 03117403

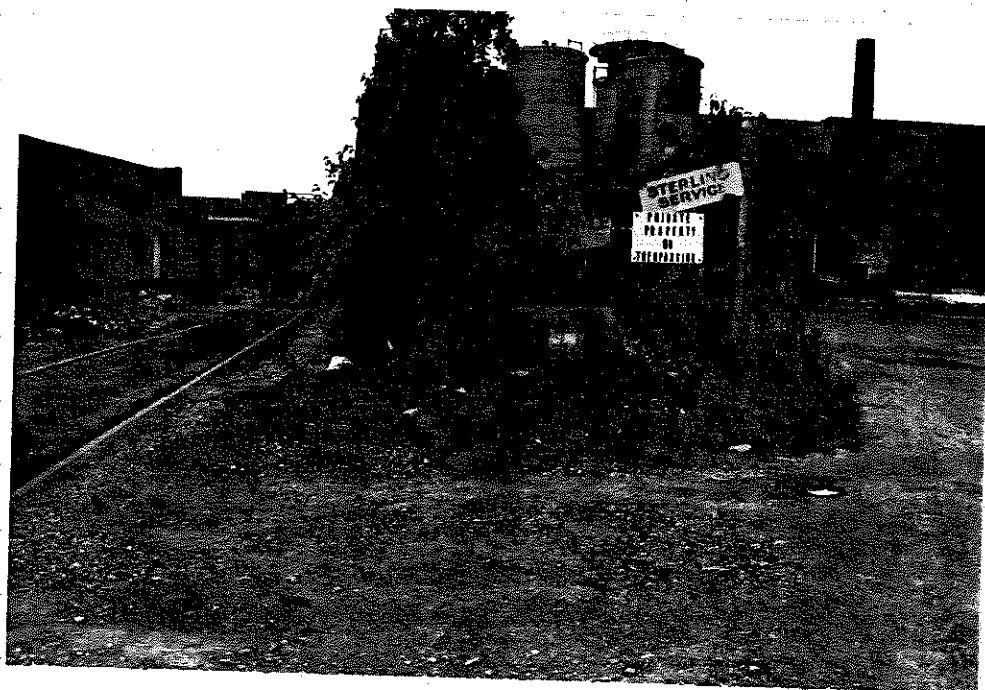
COOK Co.

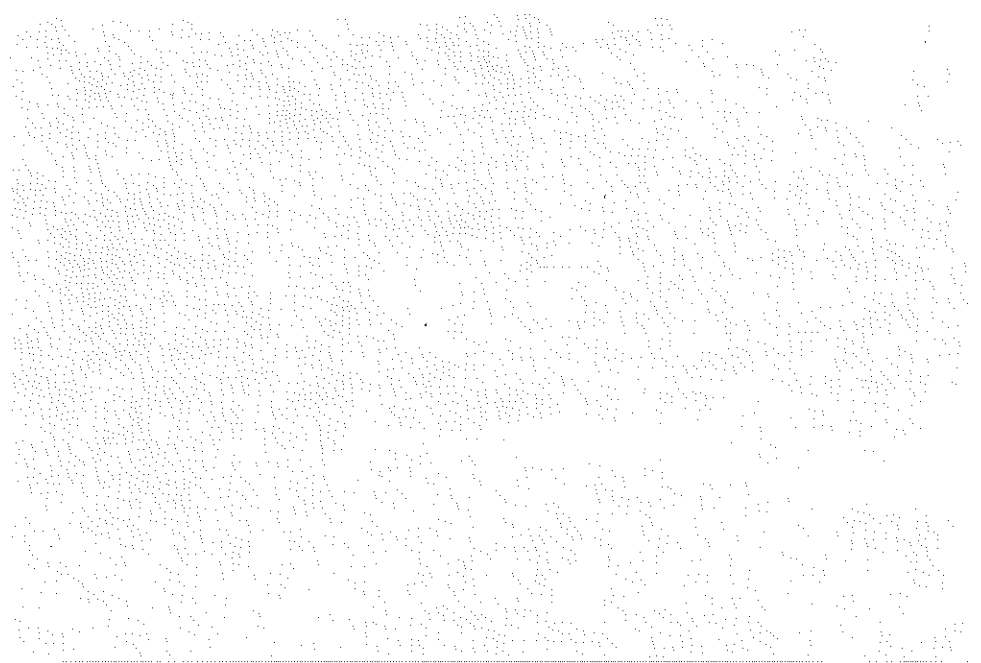
SUMMIT WELCO CHEM

Comments: Photograph taken

toward the SOUTH FROM NORTH

OF THE FACILITY





Date: 7/8/81

Time: 10:15-12:00 A.M. P.M.

Photograph By:

MARK HANEY

Location: 03117403

COOK Co.

SUMMIT IWELCO CHEM

Comments: Photograph taken

toward the NORTHEAST FROM
LOADING DOCK WEST OF THE
NORTH BUILDING



Date: 7/8/81

Time: 10:15-12:00 A.M. P.M.

Photograph By:

MARK HANEY

Location: 03117403

COOK Co.

SUMMIT IWELCO CHEM

Comments: Photograph taken

toward the SOUTHEAST FROM
LOADING DOCK WEST OF THE
NORTH BUILDING



D.L.P.C. COMPLAINT INVESTIGATION FORM

C-81-196N

COOK COUNTY - LPC
SUNNIT / I.W. INDUSTRIES (WELCO CHEM.) ()
Date Received 2/05/81 By A. BECHLEY By Phone ☐ In Person ☐ By Mail ☒
Complainant M.S.O. - AL GIEDRAITIS Respondent I.W. INDUSTRIES
Address CHICAGO, IL. Address 7738 W. 61ST PLACE
Telephone _____ Telephone 458-8700 A/E 9.30A
Directions To Source _____
Complaint Details ILLEGAL STORAGE OF HAZARDOUS WASTE - SEE ATTACHED
REPORT.

INVESTIGATION FINDINGS

Date _____ Time _____ By _____
Interviewed _____ Weather _____ Photos _____
Violations Observed _____

Respondent's Remarks _____

RECEIVED

JUL 31 1981

E.P.A. — D.L.P.C.
STATE OF ILLINOIS

FOLLOW-UP ACTION

Refer To _____

File Opened Yes No

RECEIVED

JUL 20 1981

E.P.A. — D.L.P.C.
STATE OF ILLINOIS



DATE: March 27, 1981

J: Division File

FROM: Charles Gebien

SUBJECT: Cook County - (C-81-196) - Summit/I.W. Industries (Welco Chemical)

On the morning of March 24, 1981, I visited the subject company to investigate possible unpermitted on site storage of hazardous waste as described in the complaint details.

Upon my arrival at the facility (unannounced), I was told by the receptionist that Mr. Wellman, President, was conducting a job interview and no one else was present to escort my inspection of the facility. She further suggested that I made an appointment with Mr. Wellman to conduct an inspection. I obtained Mr. Wellman's telephone number and later called him on March 27, 1981.

Mr. Wellman gave me the following information;

I.W.I. generates 50 to 75 gallons/week of a detergent-tank residue sludge as a result of their tank repairing operations. "Empty" but residue containing tanks are cleaned by a "closed" hot water-detergent utilizing tank cleaning system which "settles out" the workable detergent-water mixture. A sludge level indicator in the settling tank allows the operator of the system to activate a pump which transfers the sludge through a pipe to the two-twelve thousand gallon storage tanks. Normally the pump is activated once a week, and transfers from 50 to 75 gallons of sludge to the storage tanks. Mr. Wellman emphasized to me that this is a closed system, and that the sludge is a non-hazardous waste. He further suggested that he is in "no hurry" to make disposal arrangements at this time, because he estimates that it will take 10 years to fill both tanks. He further claims that he has tentative plans to use the sludge waste in a concrete mixture to be used as pavement in the rear of the plant. He said that he heard of this process during a conference in Houston, Texas.

Mr. Arnie Leader of U.S.E.P.A. Enforcement contacted me on the afternoon of March 27, 1981, when I relayed the above information to him. Mr. Mike Mott, U.S.E.P.A. Enforcement, and I will conduct an inspection of the subject facility on the morning of March 31, 1981. DELAYED TO 4/6/81

CG/sss

cc: Northern Region
Arnie Leader, U.S.E.P.A. Enforcement

RECEIVED
JUL 31 1981
E.P.A. — D.L.P.C.
STATE OF ILLINOIS

RECEIVED
JUL 20 1981
E.P.A. — D.L.P.C.
STATE OF ILLINOIS

NICHOLAS J. MELAS

PRESIDENT



Cecil Lue-Hing

Director
Research & Development



BOARD OF COMMISSIONERS

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RICHARD J. TROY
LOUIS S. VIVERITO

February 20, 1981

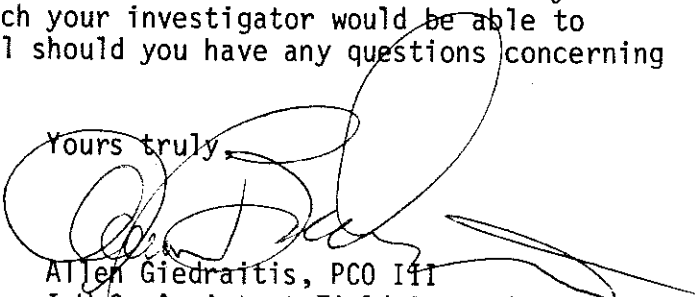
Mr. Kenneth Bechely
Illinois E.P.A.
Land Pollution Division
1701 First Avenue
Maywood, IL 60153

Dear Mr. Bechely:

Attached please find a copy of the report which I discussed with you on February 19, 1981, concerning the storage of hazardous-type wastes at I.W. Industries (Wellco Chemical Co.), 7738 West 61st Place, Summit, IL. As previously indicated, it is my belief that this firm is not permitted through the I.E.P.A. system to retain those types of wastes and therefore, this may be of interest to you for further investigation.

If additional information is required, we have files on this industry dating back a number of years which your investigator would be able to inspect. Please feel free to call should you have any questions concerning this site.

Yours truly,


Allen Giedraitis, PCO I-1
I.W.C. Assistant Field Supervisor

AG:es

Attachment

RECEIVED

FEB 23 1981

ILL. E.P.A. - D.L.P.C.
STATE OF ILLINOIS

RECEIVED

JUL 31 1981

E.P.A. - D.L.P.C.
STATE OF ILLINOIS

RECEIVED

JUL 20 1981

E.P.A. - D.L.P.C.
STATE OF ILLINOIS

Subject of Investigation:Date of Investigation:

E. Guth

I. W. Industries (Wellco Chemical Co.)
 7738 W. 61st Place
 Summit, Illinois

Oct. 24, 27, 28, Nov. 6, 12, 14, 17, 1980

FID #362 466 423 008 W

Glenn Wellman, Pres. - 458-8700

Originated by:Main Office ☒Trt. Plant ☐Clean Streams ☐Other ☐Local Authority ☐Type of Complaint:Waterway ☐Sewer ☒Other ☐

Violation 80-12 (Pb, Hg, high pH)

Supervisor Assigned:

T. Conroy

PersonDateTime

J. Tobias

10/6/80

C.D.

751-5697

Tom Conroy

WHITE BLOOM

563-2220

Water Samplers:

K. Kimbriel, O. Banks

Sample ☒ 99Photographs ☐Additional Information Attached ☒
☒ Revised Ske
 Liquid Wast
 Disposal Su
INVESTIGATION:

In response to a request from the Enforcement Section, subject company was visited on October 23, 1980, for purpose of making inspection in preparation for sampling for compliance for Violation 80-12 (Pb, Hg, high pH).

Company president Glenn Wellman could not be reached on October 23, 1980, but, eventually he was contacted and an appointment was made for November 6, 1980.

Company was sampled at Station #1A and #2A on October 24, 27, and 28, 1980, by Water Samplers K. Kimbriel and O. Banks. Company received split sample. All MSD samples were delivered to the R & D Lab for analysis.

On November 6, 1980, inspection was made by PCO 2 J. Corcoran and this writer. Mr. Wellman was contacted. Field Survey of Sludge Removal Information form was completed and is attached to this report.

Inspection of water bills revealed that company was billed for average of 5,519 gallons per day for period of June 30, 1980, to September 30, 1980. Mr. Wellman claims that air conditioning accounts for 80% of water usage in summer months and that water is run continually in winter months to prevent freezing of pipes.

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 ILL. E.P.A. - D.L.P.C.
 STATE OF ILLINOIS

(Continued on next page)

Oct. 24, 27, 28, Nov. 6, 12,
14, 17, 1980

I. W. Industries (Wellco Chemical Co.)
7738 W. 61st Place
Summit, Illinois

Water meter readings taken during sampling study indicate that water usage for period of October 24, 1980, to November 17, 1980, was 2,802 gallons per day.

Mr. Wellman also indicated that a tenant on north side of his property, Sterling Services Co., in business of storing cocoanut oil, uses water for boiler operation.

The two tanks--12,000 gallons each--used for sludge storage, were both empty at time of this inspection.

Due to configuration of pipes at Station #1A, it is difficult to assess flow and for that reason sampling should be done at upstream manhole, now designated Station #3A. Station #1A remains a good point to monitor quality of discharge from company.

Water Sampler K. Kimbriel sampled Station #2A and #3A on November 12, 14, and 17, 1980. Company received split samples. All MSD samples were delivered to the R & D Lab for analysis.

Total samples collected: Station #1A - 38
Station #2A - 36
Station #3A - 25

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FEB 27 1981

ILL. E.P.A. - D.L.P.C.
STATE OF ILLINOIS

Reviewed: J. Corcoran

J. Corcoran

TC/dms

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JUL 20 1981

E.P.A. - D.L.P.C.
STATE OF ILLINOIS

T. Conroy
T. Conroy, PCO J, Badge #136

Operator: IWI INDUSTRIES Telephone #: 458-8700

Street: 7738 W. 61ST STREET

City: SUMMIT State: IL Zip Code: 60501

Owner: GLENN WELLMAN Telephone #: 458-8700

Street: 7738 W. 61ST STREET

City: SUMMIT State: IL Zip Code: 60501

Person Interviewed	Title	Telephone #
<u>GLENN WELLMAN</u>	<u>OWNER</u>	<u>458-8700</u>

Inspection Participants	Agency/Title	Telephone #
<u>RICH FINLEY</u>	<u>IEPA / EPS 3</u>	<u>345-9780</u>
<u>ARLA GRAZER</u>	<u>IEPA / LSCT</u>	<u>345-9780</u>

Prepared By	Agency/Title	Telephone #
<u>RICH FINLEY</u>	<u>IEPA / EPS 3</u>	<u>345-9780</u>

Summary of Apparent Violations

Area	Class	Section

Area	Class	Section

Area	Class	Section

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IEPA-DLPC

NARRATIVE

I. What the company manufactures or services

performed MANUFACTURER OF TOTE TANKS.

II. Wastes generated by the company — SEE COMMENTS

A. HAZARDOUS WASTES

Name _____ EPA H.W.# _____ Process _____

Rate of Generation _____ Disposition _____

How is waste handled _____ Shipment frequency _____

Amt on site _____ Accumulate/Stored in _____

Name _____ EPA H.W.# _____ Process _____

Rate of Generation _____ Disposition _____

How is waste handled _____ Shipment frequency _____

Amt on site _____ Accumulate/Stored in _____

Name _____ EPA H.W.# _____ Process _____

Rate of Generation _____ Disposition _____

How is waste handled _____ Shipment frequency _____

Amt on site _____ Accumulate/Stored in _____

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JAN 25 1989

IEPA-DLPC

B. NON-HAZARDOUS WASTES — SEE COMMENTS

Name _____ Process _____

Rate of Generation _____ Disposition _____

How is waste handled _____ Shipment frequency _____

Amt on site _____ Accumulate/Stored in _____

Name _____ Process _____

Rate of Generation _____ Disposition _____

How is waste handled _____ Shipment frequency _____

Amt on site_____Accumulate/Stored in_____

Name _____ Process _____

Rate of Generation _____ Disposition _____

How is waste handled _____ Shipment frequency _____

Amt on site _____ Accumulate/Stored in _____

Name _____ Process _____

Rate of Generation _____ Disposition _____

How is waste handled _____ Shipment frequency _____

Amt on site _____ Accumulate/Stored in _____

III. Hazardous Waste Units — SEE COMMENTS

TYPE	ACTIVE	CLOSED	WASTES
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[illegible]

.....

.....

STEFANO A. DI NATALE

IV. RELEVANT NOTES OR OBSERVATIONS

UPON ARRIVAL AT THIS FACILITY ON 1-11-89, CAROL GRAZER AND MYSELF WERE MET BY MR. GLENN WELLMAN.

I INFORMED MR. WELLMAN THAT THE PURPOSE OF OUR VISIT WAS TO CONDUCT AN INSPECTION TO DETERMINE IWI'S COMPLIANCE WITH RCRA.

MR. WELLMAN STATED THAT UPON THE ADVICE OF HIS LAWYERS, HE COULD NOT APPROVE OF AN INSPECTION.

I ASKED MR. WELLMAN IF HE WAS REFUSING TO ALLOW US TO ENTER HIS FACILITY TO CONDUCT AN INSPECTION.

MR. WELLMAN REPLIED "WHAT CAN I SAY? MY LAWYERS TELL ME THEY WILL DROP ME IF I LET YOU IN. WE'RE IN THE MIDDLE OF LITIGATION RIGHT NOW."

I THANKED MR. WELLMAN FOR HIS TIME AND WE LEFT THE FACILITY WITHOUT CONDUCTING AN INSPECTION.

V. LIST OF VIOLATIONS: *NONE CITED*

Section #

Description

3096B

SUMMIT/I.W. INDUSTRIES, COOK COUNTY, ILLINOIS

I.W.I. repairs tanks, and in the process generates sludges. The information supplied by IEPA disclosed the existence of several rooms containing large amounts of sludges on the floors, as well as storage in drums. Waste analysis performed by IEPA suggests that the wastes placed there were likely to have been regulated if they were placed there after RCRA became effective. However, there is no information to indicate the dates of waste placement.

If the sludges were purposely placed on the floors, the facility would be a candidate for the land disposal universe as having a waste pile. If the floors are cracked, it is possible that there could be releases to the groundwater, requiring closure as a land disposal unit. The information supplied by IEPA sheds no light on the situation. (This is strange, since the latest piece of information is dated September 9, 1985. Surely things must have progressed since then.)

In conclusion, there is a possibility that the facility should be in the land disposal universe, however, we do not have enough information to support this determination.

G. Hruska
6-0989

**D. Corrective
Action**



THE ENVIRONMENTAL SERVICES COMPANY

RECEIVED

NOV 1 1985

ILL. E.P.A. - D.L.P.C.
STATE OF ILLINOIS

November 14, 1985

O.H. MATERIALS CO.
16406 U.S. Route 224 East
P.O. Box 551
Findlay, Ohio 45839-0551
Phone: 419-423-3526
800-537-9540 (24 hr)
800-537-5660 (in Ohio)
Telex: 298248 OHMI UR (RCA)

Mr. Cliff Gould
Environmental Protection Specialist
Illinois EPA
1701 South First Avenue
Maywood, IL 60153

Dear Cliff:

It is my understanding that you wanted a description of the additional work performed beyond the \$9,200 bid price at the I.W.I. facility in Summit, Illinois. The scope of work for the original bid price was to move, stage, inventory, and sample drums. OHM was to provide personnel and equipment for two days to accomplish this task. The work was performed on October 19 and 20, 1985.

At the completion of the original scope of work on October 20, 1985, a representative of the Cook County State's Attorney's office stated that the drums needed to be returned to the buildings. At that time Cliff, you requested that OHM return the following day to perform the additional work. On October 21, 1985 two people and associated equipment were sent to the site on a time and materials basis to do the additional work that was requested. At this time OHM was requested to attend a court hearing on October 22, 1985, in the event that testimony was needed from OHM.

The bid price of \$9,200 was for work performed on October 19 and 20. The additional amount of \$2,440.66 was for the requested additional work and attendance at a hearing on October 21 and 22 respectively.

As part of the agreement reached in the Judge's chambers on October 22, 1985, I.W.I. was allowed to ship clean containers off site. OHM was directed to inspect the containers to ensure that some contained waste. On October 23, 1985 OHM inspected the containers and submitted the inspection sheets to the Illinois EPA. Attached for your information is a copy of the invoice that has been submitted for the inspection work performed on October 23, 1985.

If I may be of any assistance please don't hesitate to call.

Sincerely,

Jeff Stevens
Project Manager

JS:bl

pc: Project File #3026
John Renkes, Illinois Division

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THE ENVIRONMENTAL SERVICES COMPANY

INVOICE

O.H. MATERIALS CO.

REMIT TO:
P.O. BOX 74070-S
CLEVELAND, OH 44194

NOVEMBER 14, 1985

DIRECT INQUIRIES TO:
P.O. BOX 551
FINDLAY, OH 45839
419-423-3526
800-537-9540

ILLINOIS E.P.A.
DIVISION OF LAND POLLUTION CONTROL
2200 CHURCHILL ROAD
SPRINGFIELD, IL 62706

INVOICE: 3026-002

TERMS: NET 30 DAYS

ATTENTION: ACCOUNTS PAYABLE

GENTLEMEN:

PLEASE CONSIDER THIS LETTER AS A REQUEST FOR PAYMENT FOR SERVICES RENDERED AT THE I.W.I. IN SUMMIT, ILLINOIS. THIS IS FOR ADDITIONAL WORK AUTHORIZED BY CLIFF GOULD ON A TIME AND MATERIALS BASIS.

PERSONNEL		
FRIDAY	8/23/85	500.00
EQUIPMENT		
FRIDAY	8/23/85	163.00
O.H. MATERIALS SUBTOTAL		\$663.00
PER DIEMS		
FRIDAY	8/23/85	65.00
PER DIEM SUBTOTAL		65.00
EXPENDABLES-INVENTORY		
FRIDAY	8/23/85	70.20
INVENTORY SUBTOTAL		70.20
EXPENDABLES SUBTOTAL		70.20
TOTAL INVOICE		\$798.20 =====

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NOV 22 1985

IEPA-DLPC

PROJECT DAILY DETAIL

PROJECT: 3026 CUSTOMER: ILLINOIS EPA

DATE	CHARGE CODE	DESCRIPTION	QTY	CHRG CODE	RATE	HOURS	TOTAL
FIELD PERSONNEL							
08/23	01005	SUPERVISOR	1	S. T.	55.00	5.00	275.00
08/23	01005	SUPERVISOR	1	D. T.	65.00	1.00	65.00
08/23	01044	RECOVERY TECHNICIAN	1	S. T.	25.00	5.00	125.00
08/23	01044	RECOVERY TECHNICIAN	1	D. T.	35.00	1.00	35.00
DAILY SUB-TOTAL:							500.00
4 ITEM(S)							
PERSONNEL TOTAL							500.00
PER DIEMS							
08/23	06999	PER DIEMS	2	HALF	32.50		65.00
DAILY SUB-TOTAL:							65.00
1 ITEM(S)							
PER DIEM TOTAL							65.00
EQUIPMENT							
08/23	08120	PICK-UP TRUCK	1	DAILY	75.00		75.00
08/23	16580	PHOTOIONIZATION DETECTOR	1	DAILY	70.00		70.00
08/23	49998	MILEAGE SURCHARGE	2	MILE	.20	45.00	18.00
DAILY SUB-TOTAL:							163.00
3 ITEM(S)							
EQUIPMENT TOTAL							163.00
EXPENDABLES - INVENTORY							
08/23	60002	SAMPLE GLOVES	6.0	PR	.20		1.20
08/23	60027	VINYL SHOE CVRS W/H	4.0	PR	2.30		9.20
08/23	60029	DISPOSABLE TYVEK SU	4.0	EACH	14.95		59.80
DAILY SUB-TOTAL:							70.20

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NOV 22 1985

IEPA-DLPC

RUN DATE: 14-NOV.85

O. H. Materials Company

PAGE 2

PROJECT DAILY DETAIL

PROJECT: 3026 CUSTOMER: ILLINOIS EPA

DATE	CHARGE CODE	DESCRIPTION	QTY	CHRG CODE	RATE	HOURS	TOTAL
------	----------------	-------------	-----	--------------	------	-------	-------

6 ITEM(S)

INVENTORY	70.20
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PROJECT 3039 TOTAL	798.20
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NOV 22 1985

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ILLINOIS ENVIRONMENTAL PROTECTION AGENCY

05/11/85/COOK CO
Summit/IWI Industries

MEMORANDUM

Div. File

DATE: August 15, 1985

TO: File

FROM: Cliff Gould

SUBJECT: IWI Industries, Inc.

On August 14, 1985 I returned to IWI Industries, Inc. at 7738 W. 61st Place, Summit, Illinois. This visit was in the company of Mr. R. S. Jarosik, Chief Building Inspector, Mr. Edward A. Koenig, Building Official, both of the Village of Summit; Mr. Glenn Wellman, President, IWI Industries and Mr. John Parker, Mr. Wellman's attorney. This visit was conducted at the request of the Village of Summit officials after a fire occurred at the plant at approximately 4:00 PM on August 13, 1985.

The tour of the facility began in east building (M, N and O). The areas are still being used for the manufacture and repair/testing of totes. Mr. Wellman indicated that Room O is no longer being used by the firm. The roof of this room has fallen in. Many 55 gal. drums of unknown material have been accumulated. There was a definite solvent odor detected in this room, much like laquer thinner. There was a standing pool of brownish liquid on the floor of this room.

We then went to the building where the tote cleaner is located ("S"). The drums in area "A" have been rearranged since the previous visit and it appeared that there are fewer drums in this area than were previously observed. It was in this room and in part of the tote cleaning equipment that the fire occurred. According to Wellman, the heating coils in the part of the unit where sludge is separated from the liquid (which is then reused) were uncovered and caused the insulated cover of the unit to catch fire. IWI employees were in the process of "cleaning up" this area and were shoveling sludge from the floor trench around the tote cleaner into totes and drums. The tote cleaner itself was open and I observed that the bottom portion of the unit was full of a semi-solid sludge.

We next went to the chute "E" which went thru the window into room "F". Since the visit of August of 1984, the bottom half of the window frame has been closed off using the tops of drums and material has been added to this room so that it now extends, in this area, approximately one foot above the level of the window sill. The material on the surface appears very much like the sludge observed in the tote cleaning unit.

Room "L" appeared as it did during the visit of August of 1984. We then went into the previously burned out areas "H" and "G". The level of the material in room "G" has increased by approximately one foot since the visit of August, 1984. The material appears to be the same type as previously observed - ink, paint and adhesive residues.

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AUG 20 1985

IEPA-DIPG

IWI Industries, Inc.
August 15, 1985
Page 2

Next, entering the north end of area "P", it was observed that the floor was covered with stone approximately 1 - 1½ inches in size. This stone was stained dark brown to purple in color. It appeared that liquid was leaking thru a door connecting room "P" with room "G". We then went to the south end of room "P" (the chemical mixing and packaging area). The drums observed stored in this portion of the room appeared the same as they were during the visit of May, 1985.

During this visit, I did not observe any of the three drums from which samples X201, X202 or X502 were taken during the August, 1984 site visit. It was also apparent that there were significant changes in the appearance and quantity of materials observed in areas "F" and "G".

This concluded the tour of the facility. The two representatives of Summit indicated to me that the Village had shut down the facility due to code violations at least until Friday, August 16. On the 16th, the Ill. State Fire Marshall will be inspecting the facility and it is their impression that he might shut the facility down until the violations are corrected.

CG:bh

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IEPA-DLPC



ILLINOIS ENVIRONMENTAL PROTECTION AGENCY

MEMORANDUM

TO: Gary Long, DCT, IDSPDATE: 8/20/85FROM: C. Gould☐ Information onlySUBJECT: 0311740003/Cook Co Summit/IWI Industries☐ Response requested

This is to inform you that during the activities conducted by representatives of this Agency and its contractor at the subject facility on August 19 and 20, 1985, pursuant to a search warrant, a total of 54 (fifty four) samples of liquids, semi-solid, solid residues, sludges, sediments and soils were seized. Neither 55 gal. drum (X201 or X502) were found during the search.

Clifford Gould

Env. Prot. Spec.

DLPC - FOS

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AUG 26 1985

IEPA-DLPC

cc: N. Region

Div. File. R



DATE: August 2, 1984
TO: Division File
FROM: Cliff Gould
SUBJECT: 03117403 - Cook County - Summit/IWI Industries

This was a follow-up visit to the complaint (C-84-170N) investigation done by R. Finley of this office on 7/2/84.

The following people from this office participated in this inspection: C. Gould, R. Finley, M. Wang, and B. Benning. Also present were G. Sternard and M. Bold of the Illinois Attorney General's Office. During the inspection we were accompanied by Mr. John Parker, an attorney, representing the owner of the facility, Mr. Wellman.

We held a short meeting with Parker who explained that Wellman was in a meeting and would join us later. Parker asked what the purpose of the visit was. We explained that we had received a complaint and that during the investigation of the complaint R. Finley had observed conditions that seemed to indicate that the facility was storing waste. We explained that we wanted to sample the material to determine what it might be.

We then drove around to the 61st Street side of the plant where we met Parker again. We then went on a tour of the facility with Parker. Prior to starting, Parker indicated that it was a company policy that no photos were allowed and that any photos previously obtained, including negatives, must be returned to the firm.

The tour started in the tank washing room (labeled "S" on the diagram) where drums were observed stacked three (3) high in the NW corner of the room. There were a total of approximately 540 bbls here. The first row of drums on the east side of this stack were labeled with a Wellco sticker indicating that the contents were "Grease". Some of the drums in the second layer of the first row were also labeled "Grease". It was observed that one of these labeled drums on the second level of the first row had a hole in it which appeared to have been caused by corrosion. The contents of this drum could be seen thru this hole. The material was a pinkish-redish crumble solid. This is not the characteristic appearance of a petroleum derived grease. It is more characteristic

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of a dry caustic cleaning sludge which has been colored by contaminants from the cleaning operation. The above mentioned labels appear to have been very recently applied. Drums in the second and subsequent rows west of the first row on all three levels did not appear to have labels on them indicating their contents.

This room also contains the firm's tank washing equipment, including two vertical 12,000 gallon sludge storage tanks, labeled "C" and "B" respectively.

We then proceeded out of room "S" around to room "D" where it was observed that this room was completely filled with drums of unknown material from floor to roof. Parker did not know what this material might have been.

Across from room "D" is room "F". It was observed that there were two chutes, "E", leading into this room, one on the west side, one on the north side. The chute on the north side was approximately 8 - 9 feet from ground level. The area under the north chute was very spongy, had fresh "dirt" spread over it and when stepped on, oozed a yellowish semi-liquid material. The chute on the west side was blocked by several drums.

Looking into room "F", material could be observed covering the floor to a depth just below the windows. This was a semi solid viscous material which appeared to contain ink, paint and adhesive residues. The two chutes leading into this room were also stained and covered with what appeared to be dried ink, paint and adhesive residues. Mr. Parker did not know what this room might be used for, or what the material on the floor might be.

From room "F" the tour proceeded around the building to room "L". We could not enter "L" but could see thru the window that there were drums in this room. Mr. Parker did not know what this room might be used for or what might be in the drums.

We then went to room "P". This appeared to be a chemical mixing and filling/packaging room. There was mixing and filling equipment in the room. There was a residue of material on the floor that made it slippery. Mr. Parker was not sure what materials might be handled here. There were also drums of material in the NE corner and along the south wall of this room. Parker didn't know what this material was.

From "P" we went thru rooms "M", "N", and "O", which were the active operations. These rooms were being used to "make" the totes and recondition/repair totes.

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In room "O" there were storage tanks in the southwest corner. Also, there was a second "floor" where a drum was observed. Mr. Parker was not sure what was on this second level.

We then returned to room "S" where sampling commenced. Mr. Parker split samples with us. Seven samples were collected in room "S".

- X201 - from 55 gal. drum labeled grease
- X202 - from 55 gal. drum without label
- X203 - from floor just to right of stack of drums
- X204 - from floor drain which had been covered
- X500 - from caustic cleaner catch basin
- X501 - from base of caustic cleaner
- X502 - from 55 gal. drum behind caustic cleaner

One sample, X205, was collected from the ground between the loading dock and railroad tracks on the west side of the building.

One sample, X503, was taken from a sump on the south side of room "S", outside. Sample X504 was taken from a dumpster in the driveway between rooms "S" and "O".

Sample X207 was taken from the material in room "F" next to the chute. This material activated the explosimeter alarm.

Sample X505 was taken from a tank located below the floor in room "H". This room was not seen during the tour and was in an area not used actively by the company. It was damaged as if it had been burned. Mr. Parker was not aware of what might be in the tank or when the fire occurred.

Sample X206 was taken from material covering the floor of room "G" to a depth of at least 2 1/2 feet. This room was not seen during the tour and Parker could not explain what the material was or what the room was used for. The room had been damaged by fire and the material appeared to be mixture of ink, paint and adhesive sludge.

By this time, approximately 3:45 p.m., those individuals who had donned protective clothing and were wearing respirators were beginning to show severe heat stress. As a result, we requested that any further sampling be postponed until a later date and at an earlier time to help minimize this heat stress. Parker said that he wanted the sampling completed today. Mary Wang told him that we

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SEP 20 1984
IEPA-DLPC

could not continue without putting people at risk to heat injury. Parker said that he didn't see how sampling could be continued at a later date and he could not make such an accomodation. There was a short discussion between Mary and Parker about the potentiality/ eventuality of the Agency obtaining a search warrant to complete the work. Parker said, fine.

More information about the samples is contained on the sample sheets filed separately from this memo.

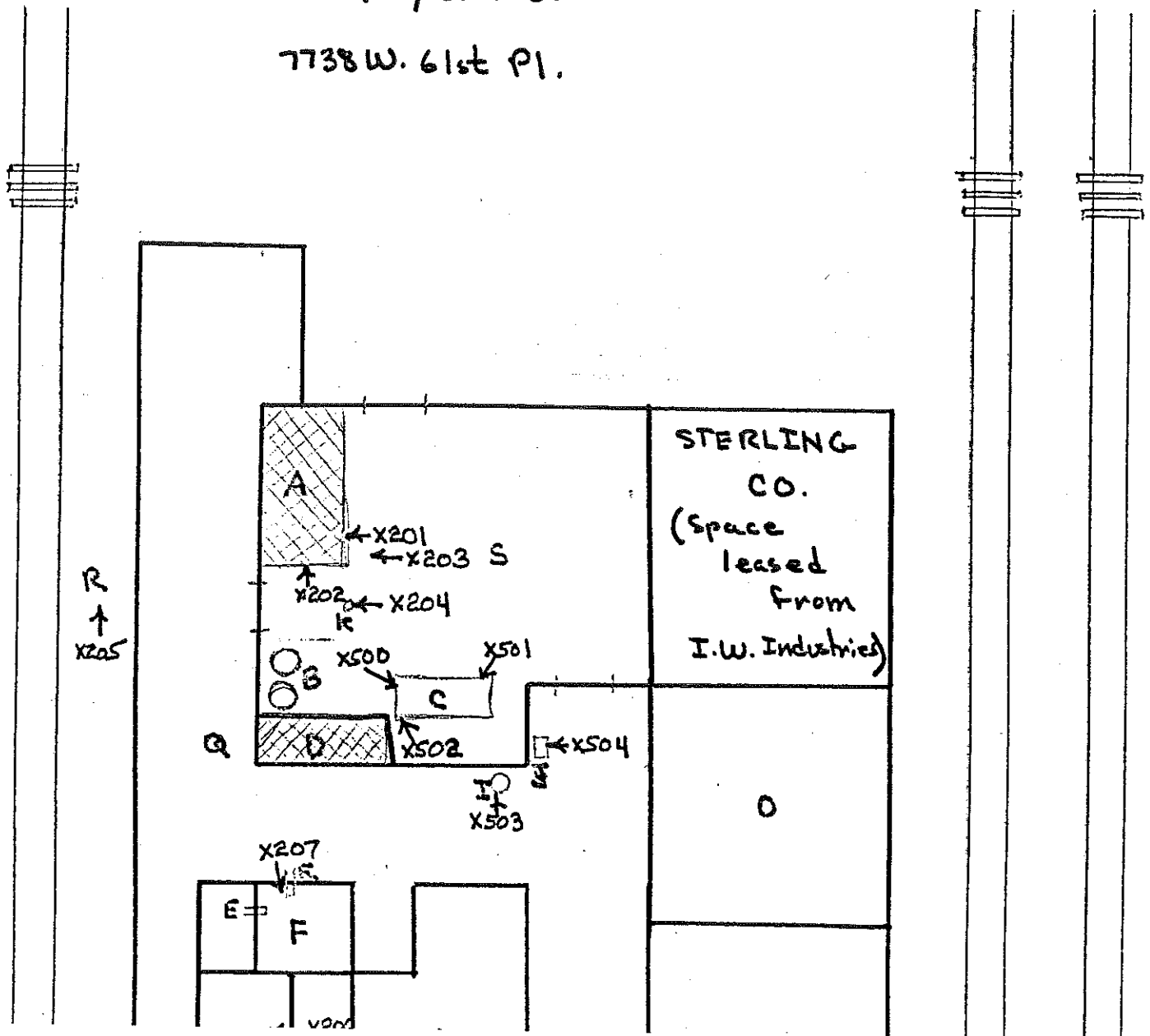
CG:pgb

cc: G. Sternard, Ill. Atty. Genl's Office
N. Region
A. Vollmer
G. King

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SEP 20 1984
IEPA-DLPC

Summit/
IW Industries
03117403/Cook Co
7738 W. 61st Pl.

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SEP 20 1984
IEPA-DLPC





ILLINOIS ENVIRONMENTAL PROTECTION AGENCY

MEMORANDUM

DATE: April 14, 1981

TO: ~~Division File~~

FROM: Charles Gebien

SUBJECT: Cook County - Summit/I.W.I. Industries (Welco) (C-81-196)
(Gen)

On April 9, 1981, Jim Corcoran, MSD-PCD, Tom Conroy, MSD-PCO, Everette Mortenson, USEPA - S&A Division, and I revisited the subject site. Arrangements for our visit were made by Mary Drake, IEPA-LPC Attorney, with Mr. Glenn Wellman, President - I.W.I. Industries on Monday, April 6, 1981. After Mr. Wellman refused to allow our entry into the plant earlier that day because of what Mr. Wellman explained to be "a plant breakdown".

Upon our arrival at the plant we met with Mr. Wellman and Mr. Cerda, I.W.I. Plant Engineer. Mr. Mortenson informed Mr. Wellman that the intent of our visit was to obtain a sample of I.W.I.'s tank cleaning sludge waste and determine through analysis if this waste is hazardous according to the federal part 261 definition of hazardous wastes. Mr. Wellman agreed to allow us to sample this waste but suggested that a sample could not be safely withdrawn from the storage tank. He also suggested that this waste is not hazardous and consists of a non-caustic mixture of detergent, paints, industrial coatings, grease, cutting oils, motor oils, and hydraulic oils.

After proceeding to the waste storage tank area, we found that the storage tanks could not be safely sampled. Access to the inside of the tanks is limited, as far as we could determine, to the inflow pipe and a bolted on "man hole" sized circular plate. Removal of the plate could have resulted in a spill as the level of waste within the tank is unknown. Mr. Wellman suggested that we return to the plant on a weekend and obtain a sample from the inflow system while the system was shut down.

Mr. Mortenson suggested that such arrangements could be made after consulting with the USEPA Enforcement Division. I will stay in contact with Mr. Mortenson and attempt to escort him to sample when arrangements are made.

cc: Northern Region
KEN BECKLEY
CG/sss

RECEIVED

JUL 24 1981

ILL. E.P.A. - D.L.P.C.
STATE OF ILLINOIS

RECEIVED

JUL 31 1981

E.P.A. - D.L.P.C.
STATE OF ILLINOIS

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JUL 20 1981

E.P.A. - D.L.P.C.
STATE OF ILLINOIS



312/345-9780

Refer to: 0311740003 - Cook County - Summit/IWI Industries, Inc.

May 1, 1985

IWI Industries, Inc.
7738 West 61st Street
Summit, Illinois 60501

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MAY 01 1985

IEPA-DLPC

Attn: Mr. Wellman

Dear Mr. Wellman:

We have received and considered Mr. Parker's letter of April 25, 1985.

Based on the Agency's previous visits to your facility and on the sample analyses received, your facility is subject to the requirements of 35 Ill. Adm. Code, Subtitle G. We therefore reiterate our intention to conduct an inspection of your facility, and have scheduled it for May 8, 1985 at 9:30 A.M.

Sincerely,

Kenneth P. Bechely, Northern Region Manager
Field Operations Section
Division of Land Pollution Control

KPB:CG:gec/Doc.#1906A

cc: **Division File**
Northern Region
P. Jagiello
D. Gimbel

